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HARBOR FREIGHT TOOLS USA, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

VITALIY VLADIMIRAVICH)	Case No.: 2:18-CV-00348-SMJ
NAZAR, individually,)	
)	HARBOR FREIGHT TOOLS USA,
Plaintiff,)	INC.'S SECOND SUPPLEMENTAL
)	DISCLOSURE OF EXPERT
v.)	TESTIMONY PURSUANT TO FRCP
)	26(a)(2)
HARBOR FREIGHT TOOLS USA,)	
INC., a Delaware corporation; and)	
JOHN DOES 1-100,)	
)	
Defendants.)	

PLEASE TAKE NOTICE, that pursuant to Federal Rule of Civil Procedure 26(a)(2), defendant Harbor Freight Tools USA, Inc. ("Harbor Freight"), by and through its attorneys, hereby supplements its disclosure of expert witnesses as follows:

1. Mark R. Newton, CPA/ABV, CFF
1325 Fourth Avenue, Suite 1705
Seattle, WA 98101

1 206-792-0214

2 Mark R. Newton, CPA/ABV, CFF is a certified public accountant, expected to
3 provide testimony related to Plaintiff's alleged damages, as indicated in his initial report,
4 and his supplemental report, a copy of which is attached hereto as Exhibit A, and in
5 response to any evidence and opinions presented by Plaintiff on this topic.
6

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8 PLEASE TAKE FURTHER NOTICE that Harbor Freight reserves the right to
9 supplement and/or amend this expert disclosure upon additional investigation and
10 discovery in this matter. Further, in accordance with Rule 26(a)(2)(D) and (E), Harbor
11 Freight reserves the right to have any expert issue supplemental reports in further
12 response to reports produced by any experts disclosed by Plaintiff, and to designate and
13 call expert rebuttal witnesses, as needed, at the time of trial.
14
15

16 Dated: April 20, 2020.

FOLEY & MANSFIELD LLP

17 By: /s/ James D. Hicks

18 Melissa K. Roeder, WSBA #30836

19 James D. Hicks, WSBA #36126

20 Laura Ashley Martin, Esq., Pro Hac Vice

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22 Attorneys for Defendant

23 HARBOR FREIGHT TOOLS USA, INC.
24
25

1 **CERTIFICATE OF SERVICE**

2 I, Laura McKeon, declare that I am employed by the law firm of Foley &
3 Mansfield, PLLP, 999 Third Avenue, Suite 3760, Seattle, Washington; that I am over 18
4 years of age and not a party to this action.

5 [X] **(By E-Service)** I hereby certify that on this date I electronically filed the
6 foregoing document with the U.S. District Court for the Eastern District of Washington at
7 Seattle using the CM/ECF system, which will send notification to all parties of record.

8
9 **Counsel for Plaintiff**

10 Vitaliy Vladimirovich Nazar
11 Aaron A. Crary
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13 CHUANG
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15 Spokane, WA 99206
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9 **Counsel for Plaintiff**

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17 I declare under penalty of perjury under the law of the State of Washington that the
18 foregoing is true and correct.

19 Executed this 20th day of April, 2020, in Seattle, Washington.

21 /s/ Laura McKeon

22 Laura McKeon, Legal Assistant